

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
(Richmond District)**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>CIRCUIT CITY STORES, INC., et al.,</b>	)	<b>Case No: 08-35653-KRH</b>
	)	<b>(Jointly Administered)</b>
	)	
<b>Debtors.</b>	)	

**MOTION TO ADMIT COUNSEL *PRO HAC VICE***

Pursuant to Local Rule 2090-1(E)(2), the undersigned, Michael D. Mueller, Esq., of Christian & Barton, LLP, a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia, files this motion with the Court for an Order permitting admission of Ronald G. Dunn, Esq. of the law firm of Gleason, Dunn, Walsh & O'Shea, 40 Beaver Street, Albany, New York 12207 to appear and practice *pro hac vice* on behalf of Savitri Cohen in the above-captioned matter. In support thereof, and based on his investigation of Mr. Dunn's background and experience, the Movant states the following:

1. Mr. Dunn graduated from Albany Law School of Union University in 1980. Thereafter, Mr. Dunn was admitted to the New York State Bar in 1981 and is a member in good standing of that Bar.

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Michael D. Mueller, Esquire (VSB 38216)  
Augustus C. Epps, Jr., Esquire (VSB 13254)  
Jennifer M. McLemore, Esquire (VSB 47164)  
Noelle M. James, Esquire (VSB 76001)  
CHRISTIAN & BARTON, LLP  
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Local Counsel for Savitri Cohen

2. Mr. Dunn is admitted to practice before the United States District Court for the Northern, Western and Southern Districts of New York, as well as the United States Court of Appeals, Second Circuit and the United States Supreme Court.

3. Mr. Dunn is a member of the law firm of Gleason, Dunn, Walsh & O'Shea located in Albany, New York.

4. Mr. Dunn is "AV" rated (highest level of professional excellence) by his peers in Martindale Hubbell's Legal Network.

5. Mr. Dunn's practice areas include Labor and Employment Law on behalf of individual plaintiffs and unions.

6. Mr. Dunn's experience will provide insight into the unique application of labor and employment law to bankruptcy proceedings, including whether specific employment agreements can survive bankruptcy.

7. Mr. Dunn is well qualified to appear in this Court for the purposes stated herein, and he is familiar with and will comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules of this Court.

8. Mr. Dunn has never been disbarred, suspended or denied admission to practice law. Mr. Dunn understands that he shall be subject to the disciplinary jurisdiction of this Court.

9. Savitri Cohen wished that Mr. Dunn be admitted as her counsel in this matter, together with the Movant.

WHEREFORE, Michael D. Mueller, Esq., respectfully requests that this Court enter an order admitting Ronald G. Dunn, Esq., *pro hac vice* to the bar of this Court in connection with the instant action and for such other and further relief as the Court deems just and appropriate.

Dated: January 7, 2009

Respectfully submitted,

CHRISTIAN & BARTON, LLP

/s/ Michael D. Mueller

Michael D. Mueller

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 7<sup>th</sup> day of January, 2009, I caused a copy of the foregoing to be served electronically through the ECF system and by first class mail on the following:

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/s/ Michael D. Mueller  
Michael D. Mueller

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